1 Timothy O. Hemming, Nevada Bar No. 14375 tim.hemming@dentons.com DENTONS DURHAM JONES PINEGAR P.C. 2 192 East 200 North, 3rd Floor 3 St. George, UT 84770 Telephone: 435 674 0400 4 Facsimile: 435 628 1610 5 David W. Tufts, pro hac vice david.tufts@dentons.com 6 DENTONS DURHAM JONES PINEGAR P.C. 111 S. Main Street, Suite 2400 7 Salt Lake City, UT 84111 Telephone: 801 415 3000 8 Facsimile: 801 415 3500 Attorneys for Plaintiff 9 Michael D. Rawlins, Nevada Bar No. 5467 10 3333 E. Serene Ave. Suite 130 Henderson, NV. 89074 Designated solely for service pursuant to LR IA 11-1(b) 11 12 UNITED STATES DISTRICT COURT 13 DISTRICT OF NEVADA 14 SMART RAIN SYSTEMS, LLC, a Utah Limited Case No.: 2:22-cv-00232-GMN-EJY Liability Company, 15 **JOINT STIPULATION AND** Plaintiff, 16 | PROPOSED| ORDER TO EXTEND THE DEADLINE TO RESPOND TO VS. 17 THE COMPLAINT RÖHREN- UND PUMPENWERK BAUER 18 GES.M.B.H., a limited liability company of (SECOND REQUEST) Austria; BAUER NORTH AMERICA, INC., a 19 foreign corporation; DOES 1 through 10 20 Defendants. 21 22 IT IS HEREBY STIPULATED AND AGREED, by Defendant Bauer North America, Inc. 23 ("Bauer NA"), Defendant Röhren -und Pumpenwerk Bauer Ges.m.b.H. ("Bauer GmbH") (collectively, 24 "Bauer"), and Plaintiff Smart Rain Systems, LLC ("Smart Rain"), through their respective counsel, 25 that the time for Bauer to respond to the Complaint be extended up to and including September 7, 2022.

Bauer's current deadline to respond to the Complaint is August 8, 2022. The additional thirty days

stipulated to herein allows the parties more time to explore the possibility of an early settlement.

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## Case 2:22-cv-00232-CDS-EJY Document 19 Filed 08/04/22 Page 2 of 3

The reason for the extension is not for purposes of delay or to cause prejudice to any party, but rather is to allow the parties to discuss settlement options. This is the parties' second request for such an extension from the Court, having had a previous extension granted on June 3, 2022 [Docket 17]. This request complies with Local Rules IA 6-1, IA 6-2, and 7-1.

[Signatures to Follow]

1	Dated: August 4, 2022.	
2	/s/ Chad R. Fears	/s/ Timothy O. Hemming
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12	Augustin Com Defendance	Attorneys for Plaintiff
13	Attorneys for Defendants Röhren -und Pumpenwerk Bauer	Michael E. Rawlins, Esq. (SBN 5467)
1.4	Ges.m.b.H. and	3333 E. Serene Avenue, Suite 139
14	Bauer North America, Inc.	Henderson, NV 89074
15	(Signed by filing attorney with permission	Designated solely for service pursuant to
1.0	received via e-mail on August 4, 2022)	LR IA 11-1(b)
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17		
18		<u>ORDER</u>
19	IT IS SO ORDERED.	
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21		6 190 00
22		INITEDATATE MA GISTRATE HIDGE
22		UNITED STATE MAGISTRATE JODGE
23		
24		Dated: August 4, 2022
25		
26		
27		